

EXHIBIT B

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Attorneys for Non-Party
THELEN REID BROWN RAYSMAN & STEINER LLP

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

ANGELES CHEMICAL COMPANY, INC., a
California corporation, etc., et al.,

Plaintiffs,

v.

MCKESSON CORPORATION, a California
corporation, etc., et al.

Defendants.

Case No.: 01-10532 TJH (Ex)

Central District of California

**OBJECTIONS OF NON-PARTY
THELEN REID BROWN RAYSMAN &
STEINER LLP TO ANGELES
CHEMICAL COMPANY, INC.'S
SUBPOENA REQUESTING
PRODUCTION OF DOCUMENTS
PURSUANT TO FRCP 45**

Place: 101 Second Street, Suite 1800, San
Francisco, CA 94105

Date: June 11, 2007

Time: 9:30 a.m.

AND RELATED CROSS ACTION.

Pursuant to Federal Rule of Civil Procedure 45, non-party Thelen Reid Brown Raysman & Steiner LLP ("Thelen") submits these responses and objections to the subpoena of plaintiff and cross-defendant Angeles Chemical Company, Inc. ("Angeles") dated May 14, 2007, issued by Caufield & James, LLP and served on Thelen's San Francisco office on May 14, 2007 (the "Subpoena") in the above-referenced matter.

///

GENERAL OBJECTIONS

1
2 1. Thelen objects to the Subpoena to the extent it seeks documents protected by the
3 attorney-client privilege, work product doctrine, deliberative process privilege, the joint
4 prosecution or similar privilege, the privilege for negotiations leading to settlement, or other
5 applicable privileges under California law or any other applicable law.

6 2. Thelen objects to the Subpoena to the extent that it imposes an undue burden on
7 Thelen by seeking documents that are neither relevant nor reasonably calculated to lead to the
8 discovery of admissible evidence, seeking an unreasonably large volume of documents, or seeking
9 documents that are equally available to the requesting party.

10 3. Thelen objects to the Subpoena on the grounds that Angeles' "DEFINITIONS" and
11 "INSTRUCTIONS," as set forth in Attachment "A" are argumentative, vague, ambiguous, and
12 unintelligible.

13 4. Thelen objects to the Subpoena on the grounds that it does not allow a reasonable
14 time period for compliance.

15 5. No incidental or implied admissions are intended by these objections. The fact that
16 Thelen objects to any request should not be taken as an admission that Thelen accepts or admits
17 the existence of any facts assumed by such request, or that such objection constitutes admissible
18 evidence as to any such assumed facts.

SPECIFIC OBJECTIONS

19
20 Without waiving or departing from its General Objections, and specifically incorporating
21 the General Objections into each of the specific objections below, Thelen makes the following
22 additional objections to specific paragraphs set forth in Attachment "A" of the Subpoena:

REQUEST FOR PRODUCTION A):

23
24 All DOCUMENTS that REFER OR RELATE to MCKESSON CHEMICAL.

OBJECTIONS TO REQUEST FOR PRODUCTION A):

25
26 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
27 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
28 admissible evidence. Thelen further objects to this Request to the extent that it seeks documents

1 containing McKesson Corporation's ("McKesson") trade secrets and proprietary information. In
2 addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-
3 parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents
4 protected by the attorney-client privilege, attorney work product doctrine, and any other applicable
5 privilege.

6 **REQUEST FOR PRODUCTION B):**

7 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of an
8 HAZARDOUS SUBSTANCE.

9 **OBJECTIONS TO REQUEST FOR PRODUCTION B):**

10 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
11 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
12 admissible evidence. Thelen also objects to the phrase "HAZARDOUS SUBSTANCE" on the
13 grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it
14 seeks documents containing McKesson's trade secrets and proprietary information. In addition,
15 Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to
16 the litigation. Thelen also objects to this Request to the extent that it seeks documents protected
17 by the attorney-client privilege, attorney work product doctrine, and any other applicable
18 privilege.

19 **REQUEST FOR PRODUCTION C):**

20 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of
21 any HAZARDOUS WASTE.

22 **OBJECTIONS TO REQUEST FOR PRODUCTION C):**

23 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
24 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
25 admissible evidence. Thelen also objects to the phrase "HAZARDOUS WASTE" on the grounds
26 that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks
27 documents containing McKesson's trade secrets and proprietary information. In addition, Thelen
28 objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the

1 litigation. Thelen also objects to this Request to the extent that it seeks documents protected by
2 the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

3 **REQUEST FOR PRODUCTION D):**

4 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of
5 any SOLID WASTE.

6 **OBJECTIONS TO REQUEST FOR PRODUCTION D):**

7 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
8 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
9 admissible evidence. Thelen also objects to the phrase "SOLID WASTE" on the grounds that it is
10 vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents
11 containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to
12 this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.
13 Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-
14 client privilege, attorney work product doctrine, and any other applicable privilege.

15 **REQUEST FOR PRODUCTION E):**

16 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of
17 any CHLORINATED SOLVENTS.

18 **OBJECTIONS TO REQUEST FOR PRODUCTION E):**

19 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
20 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
21 admissible evidence. Thelen also objects to the phrase "CHLORINATED SOLVENTS" on the
22 grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it
23 seeks documents containing McKesson's trade secrets and proprietary information. In addition,
24 Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to
25 the litigation. Thelen also objects to this Request to the extent that it seeks documents protected
26 by the attorney-client privilege, attorney work product doctrine, and any other applicable
27 privilege.

28 ///

REQUEST FOR PRODUCTION F):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any HAZARDOUS SUBSTANCE.

OBJECTIONS TO REQUEST FOR PRODUCTION F):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "HAZARDOUS SUBSTANCE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION G):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any HAZARDOUS WASTE.

OBJECTIONS TO REQUEST FOR PRODUCTION G):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "HAZARDOUS WASTE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION H):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any SOLID WASTE.

OBJECTIONS TO REQUEST FOR PRODUCTION H):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "SOLID WASTE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION I):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any CHLORINATED SOLVENTS.

OBJECTIONS TO REQUEST FOR PRODUCTION I):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "CHLORINATED SOLVENTS" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION J):

ALL DOCUMENTS that REFER TO RELATE to the storage, retention, destruction, or transfer of DOCUMENTS of MCKESSON CHEMICAL between 1986 and 2005.

OBJECTIONS TO REQUEST FOR PRODUCTION J):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of

1 admissible evidence. Thelen further objects to this Request to the extent that it seeks documents
2 containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to
3 this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.
4 Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-
5 client privilege, attorney work product doctrine, and any other applicable privilege.

6 **REQUEST FOR PRODUCTION K):**

7 ALL DOCUMENTS that REFER TO RELATE to any discussion, convention, or
8 CORRESPONDENCE with any PERSON regarding the MCKESSON SITE or the above-entitled
9 action.

10 **OBJECTIONS TO REQUEST FOR PRODUCTION K):**

11 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
12 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
13 admissible evidence. Thelen further objects to this Request to the extent that it seeks documents
14 containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to
15 this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.
16 Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-
17 client privilege, attorney work product doctrine, and any other applicable privilege.

18 Dated: May 29 2007

THELEN REID BROWN RAYSMAN & STEINER LLP

19
20 By: 

Jennifer A. Kuenster

Ross M. Petty

Attorneys for Non-Party

THELEN REID BROWN RAYSMAN &
STEINER LLP

CERTIFICATE OF SERVICE BY FACSIMILE

CASE NO. 01-10532 TJH (Ex)

I am over the age of 18 and not a party to the within action. I am employed in the County of San Francisco, State of California by Thelen Reid Brown Raysman & Steiner LLP. My business address is 101 Second Street, Suite 1800, San Francisco, California 94105.

On May 29, 2007, at the time and from the telephone facsimile number indicated on the attached transmission report, the following entitled document:

**OBJECTIONS OF NON-PARTY THELEN REID BROWN
RAYSMAN & STEINER LLP TO ANGELES CHEMICAL
COMPANY, INC.'S SUBPOENA REQUESTING
PRODUCTION OF DOCUMENTS PURSUANT TO FRCP 45**

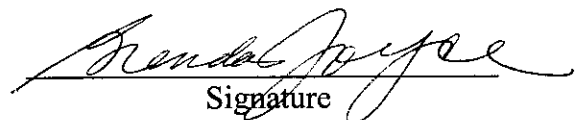
was served by transmitting true and correct copies thereof via facsimile to the following:

SEE ATTACHED SERVICE LIST

I am readily familiar with the practices of Thelen Reid Brown Raysman & Steiner LLP for sending documents via facsimile. On the above stated date, the above listed document was transmitted via facsimile and said transmission was reported complete and without error. A copy of the transmission report showing the date and time of transmission that was properly issued by the transmitting facsimile machine is attached hereto, and incorporated herein by reference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 29, 2007, at San Francisco, California.


Signature

Brenda Joyce

SERVICE LIST

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20 BERG, PEARL ROSENTHAL and THE
21 ESTATE OF ARNOLD ROSENTHAL]
22
23
24
25
26
27
28

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Attorneys for Non-Party
THELEN REID BROWN RAYSMAN & STEINER LLP

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

ANGELES CHEMICAL COMPANY, INC., a
California corporation, etc., et al.,

Plaintiffs,

v.

MCKESSON CORPORATION, a California
corporation, etc., et al.

Defendants.

Case No.: 01-10532 TJH (Ex)

Central District of California

**OBJECTIONS OF NON-PARTY
THELEN REID BROWN RAYSMAN &
STEINER LLP TO ANGELES
CHEMICAL COMPANY, INC.'S
SUBPOENA REQUESTING
PRODUCTION OF DOCUMENTS
PURSUANT TO FRCP 45**

Place: 225 West Santa Clara Street, Suite
1200, San Jose, CA 95113

Date: June 11, 2007

Time: 9:30 a.m.

AND RELATED CROSS ACTION.

Pursuant to Federal Rule of Civil Procedure 45, non-party Thelen Reid Brown Raysman & Steiner LLP ("Thelen") submits these objections to the subpoena of plaintiff and cross-defendant Angeles Chemical Company, Inc. ("Angeles") dated May 15, 2007, issued by Caufield & James, LLP and served on Thelen's San Jose office on May 15, 2007 (the "Subpoena") in the above-referenced matter.

///

GENERAL OBJECTIONS

1
2 1. Thelen objects to the Subpoena to the extent it seeks documents protected by the
3 attorney-client privilege, work product doctrine, deliberative process privilege, the joint
4 prosecution or similar privilege, the privilege for negotiations leading to settlement, or other
5 applicable privileges under California law or any other applicable law.

6 2. Thelen objects to the Subpoena to the extent that it imposes an undue burden on
7 Thelen by seeking documents that are neither relevant nor reasonably calculated to lead to the
8 discovery of admissible evidence, seeking an unreasonably large volume of documents, or seeking
9 documents that are equally available to the requesting party.

10 3. Thelen objects to the Subpoena on the grounds that Angeles' "DEFINITIONS" and
11 "INSTRUCTIONS," as set forth in Attachment "A" are argumentative, vague, ambiguous, and
12 unintelligible.

13 4. Thelen objects to the Subpoena on the grounds that it does not allow a reasonable
14 time period for compliance.

15 5. No incidental or implied admissions are intended by these objections. The fact that
16 Thelen objects to any request should not be taken as an admission that Thelen accepts or admits
17 the existence of any facts assumed by such request, or that such objection constitutes admissible
18 evidence as to any such assumed facts.

SPECIFIC OBJECTIONS

19
20 Without waiving or departing from its General Objections, and specifically incorporating
21 the General Objections into each of the specific objections below, Thelen makes the following
22 additional objections to specific paragraphs set forth in Attachment "A" of the Subpoena:

REQUEST FOR PRODUCTION A):

24 All DOCUMENTS that REFER OR RELATE to MCKESSON CHEMICAL.

OBJECTIONS TO REQUEST FOR PRODUCTION A):

26 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
27 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
28 admissible evidence. Thelen further objects to this Request to the extent that it seeks documents

1 containing McKesson Corporation's ("McKesson") trade secrets and proprietary information. In
2 addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-
3 parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents
4 protected by the attorney-client privilege, attorney work product doctrine, and any other applicable
5 privilege.

6 **REQUEST FOR PRODUCTION B):**

7 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of an
8 HAZARDOUS SUBSTANCE.

9 **OBJECTIONS TO REQUEST FOR PRODUCTION B):**

10 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
11 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
12 admissible evidence. Thelen also objects to the phrase "HAZARDOUS SUBSTANCE" on the
13 grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it
14 seeks documents containing McKesson's trade secrets and proprietary information. In addition,
15 Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to
16 the litigation. Thelen also objects to this Request to the extent that it seeks documents protected
17 by the attorney-client privilege, attorney work product doctrine, and any other applicable
18 privilege.

19 **REQUEST FOR PRODUCTION C):**

20 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of
21 any HAZARDOUS WASTE.

22 **OBJECTIONS TO REQUEST FOR PRODUCTION C):**

23 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
24 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
25 admissible evidence. Thelen also objects to the phrase "HAZARDOUS WASTE" on the grounds
26 that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks
27 documents containing McKesson's trade secrets and proprietary information. In addition, Thelen
28 objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the

litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION D):

ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of any SOLID WASTE.

OBJECTIONS TO REQUEST FOR PRODUCTION D):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "SOLID WASTE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION E):

ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of any CHLORINATED SOLVENTS.

OBJECTIONS TO REQUEST FOR PRODUCTION E):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "CHLORINATED SOLVENTS" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

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1 **REQUEST FOR PRODUCTION F):**

2 ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of
3 any HAZARDOUS SUBSTANCE.

4 **OBJECTIONS TO REQUEST FOR PRODUCTION F):**

5 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
6 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
7 admissible evidence. Thelen also objects to the phrase "HAZARDOUS SUBSTANCE" on the
8 grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it
9 seeks documents containing McKesson's trade secrets and proprietary information. In addition,
10 Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to
11 the litigation. Thelen also objects to this Request to the extent that it seeks documents protected
12 by the attorney-client privilege, attorney work product doctrine, and any other applicable
13 privilege.

14 **REQUEST FOR PRODUCTION G):**

15 ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of
16 any HAZARDOUS WASTE.

17 **OBJECTIONS TO REQUEST FOR PRODUCTION G):**

18 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
19 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
20 admissible evidence. Thelen also objects to the phrase "HAZARDOUS WASTE" on the grounds
21 that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks
22 documents containing McKesson's trade secrets and proprietary information. In addition, Thelen
23 objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the
24 litigation. Thelen also objects to this Request to the extent that it seeks documents protected by
25 the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

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28 ///

REQUEST FOR PRODUCTION H):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any SOLID WASTE.

OBJECTIONS TO REQUEST FOR PRODUCTION H):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "SOLID WASTE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION I):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any CHLORINATED SOLVENTS.

OBJECTIONS TO REQUEST FOR PRODUCTION I):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "CHLORINATED SOLVENTS" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

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REQUEST FOR PRODUCTION J):

ALL DOCUMENTS that REFER TO RELATE to the storage, retention, destruction, or transfer of DOCUMENTS of MCKESSON CHEMICAL between 1986 and 2005.

OBJECTIONS TO REQUEST FOR PRODUCTION J):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION K):

ALL DOCUMENTS that REFER TO RELATE to any discussion, convention, or CORRESPONDENCE with any PERSON regarding the MCKESSON SITE or the above-entitled action.

OBJECTIONS TO REQUEST FOR PRODUCTION K):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION L):

ALL DOCUMENTS that REFER TO RELATE to any discussion, conversation, or CORRESPONDENCE with UNIVAR regarding the MCKESSON SITE or the above-entitled action.

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OBJECTIONS TO REQUEST FOR PRODUCTION L):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION M):

ALL DOCUMENTS that REFER TO RELATE to any discussion, conversation, or CORRESPONDENCE with UNIVAR regarding the transmittal of ALL DOCUMENTS that relate to MCKESSON CHEMICAL.

OBJECTIONS TO REQUEST FOR PRODUCTION M):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION N):

ALL DOCUMENTS that REFER TO RELATE to any discussion, conversation, or CORRESPONDENCE with UNIVAR regarding the transmittal of ALL DOCUMENTS relate to the MCKESSON SITE.

OBJECTIONS TO REQUEST FOR PRODUCTION N):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents

1 containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to
2 this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.
3 Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-
4 client privilege, attorney work product doctrine, and any other applicable privilege.

5 Dated: May 28 2007

THELEN REID BROWN RAYSMAN & STEINER LLP

6
7 By: 

Jennifer A. Kuenster

Ross M. Petty

Attorneys for Non-Party

THELEN REID BROWN RAYSMAN &
STEINER LLP

CERTIFICATE OF SERVICE BY FACSIMILE

CASE NO. 01-10532 TJH (Ex)

I am over the age of 18 and not a party to the within action. I am employed in the County of San Francisco, State of California by Thelen Reid Brown Raysman & Steiner LLP. My business address is 101 Second Street, Suite 1800, San Francisco, California 94105.

On May 29, 2007, at the time and from the telephone facsimile number indicated on the attached transmission report, the following entitled document:

**OBJECTIONS OF NON-PARTY THELEN REID BROWN
RAYSMAN & STEINER LLP TO ANGELES CHEMICAL
COMPANY, INC.'S SUBPOENA REQUESTING
PRODUCTION OF DOCUMENTS PURSUANT TO FRCP 45**

was served by transmitting true and correct copies thereof via facsimile to the following:

SEE ATTACHED SERVICE LIST

I am readily familiar with the practices of Thelen Reid Brown Raysman & Steiner LLP for sending documents via facsimile. On the above stated date, the above listed document was transmitted via facsimile and said transmission was reported complete and without error. A copy of the transmission report showing the date and time of transmission that was properly issued by the transmitting facsimile machine is attached hereto, and incorporated herein by reference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 29, 2007, at San Francisco, California.


Signature

Brenda Joyce

SERVICE LIST

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21 ESTATE OF ARNOLD ROSENTHAL]
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Attorneys for Non-Party
THELEN REID BROWN RAYSMAN & STEINER LLP

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

ANGELES CHEMICAL COMPANY, INC., a
California corporation, etc., et al.,

Plaintiffs,

v.

MCKESSON CORPORATION, a California
corporation, etc., et al.

Defendants.

Case No.: 01-10532 TJH (Ex)

Central District of California

**OBJECTIONS OF NON-PARTY
THELEN REID BROWN RAYSMAN &
STEINER LLP TO ANGELES
CHEMICAL COMPANY, INC.'S
SUBPOENA REQUESTING
PRODUCTION OF DOCUMENTS
PURSUANT TO FRCP 45**

Place: 2225 E. Bayshore Road, Suite 210, Palo
Alto, CA 94303

Date: June 11, 2007

Time: 9:30 a.m.

AND RELATED CROSS ACTION.

Pursuant to Federal Rule of Civil Procedure 45, non-party Thelen Reid Brown Raysman & Steiner LLP ("Thelen") submits these objections to the subpoena of plaintiff and cross-defendant Angeles Chemical Company, Inc. ("Angeles") dated May 15, 2007, issued by Caufield & James, LLP and served on Thelen's Palo Alto office on May 15, 2007 (the "Subpoena") in the above-referenced matter.

///

GENERAL OBJECTIONS

1
2 1. Thelen objects to the Subpoena to the extent it seeks documents protected by the
3 attorney-client privilege, work product doctrine, deliberative process privilege, the joint
4 prosecution or similar privilege, the privilege for negotiations leading to settlement, or other
5 applicable privileges under California law or any other applicable law.

6 2. Thelen objects to the Subpoena to the extent that it imposes an undue burden on
7 Thelen by seeking documents that are neither relevant nor reasonably calculated to lead to the
8 discovery of admissible evidence, seeking an unreasonably large volume of documents, or seeking
9 documents that are equally available to the requesting party.

10 3. Thelen objects to the Subpoena on the grounds that Angeles' "DEFINITIONS" and
11 "INSTRUCTIONS," as set forth in Attachment "A" are argumentative, vague, ambiguous, and
12 unintelligible.

13 4. Thelen objects to the Subpoena on the grounds that it does not allow a reasonable
14 time period for compliance.

15 5. No incidental or implied admissions are intended by these objections. The fact that
16 Thelen objects to any request should not be taken as an admission that Thelen accepts or admits
17 the existence of any facts assumed by such request, or that such objection constitutes admissible
18 evidence as to any such assumed facts.

SPECIFIC OBJECTIONS

19
20 Without waiving or departing from its General Objections, and specifically incorporating
21 the General Objections into each of the specific objections below, Thelen makes the following
22 additional objections to specific paragraphs set forth in Attachment "A" of the Subpoena:

REQUEST FOR PRODUCTION A):

23
24 All DOCUMENTS that REFER OR RELATE to MCKESSON CHEMICAL.

OBJECTIONS TO REQUEST FOR PRODUCTION A):

25
26 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
27 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
28 admissible evidence. Thelen further objects to this Request to the extent that it seeks documents

1 containing McKesson Corporation's ("McKesson") trade secrets and proprietary information. In
2 addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-
3 parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents
4 protected by the attorney-client privilege, attorney work product doctrine, and any other applicable
5 privilege.

6 **REQUEST FOR PRODUCTION B):**

7 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of an
8 HAZARDOUS SUBSTANCE.

9 **OBJECTIONS TO REQUEST FOR PRODUCTION B):**

10 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
11 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
12 admissible evidence. Thelen also objects to the phrase "HAZARDOUS SUBSTANCE" on the
13 grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it
14 seeks documents containing McKesson's trade secrets and proprietary information. In addition,
15 Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to
16 the litigation. Thelen also objects to this Request to the extent that it seeks documents protected
17 by the attorney-client privilege, attorney work product doctrine, and any other applicable
18 privilege.

19 **REQUEST FOR PRODUCTION C):**

20 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of
21 any HAZARDOUS WASTE.

22 **OBJECTIONS TO REQUEST FOR PRODUCTION C):**

23 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
24 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
25 admissible evidence. Thelen also objects to the phrase "HAZARDOUS WASTE" on the grounds
26 that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks
27 documents containing McKesson's trade secrets and proprietary information. In addition, Thelen
28 objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the

1 litigation. Thelen also objects to this Request to the extent that it seeks documents protected by
2 the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

3 **REQUEST FOR PRODUCTION D):**

4 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of
5 any SOLID WASTE.

6 **OBJECTIONS TO REQUEST FOR PRODUCTION D):**

7 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
8 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
9 admissible evidence. Thelen also objects to the phrase "SOLID WASTE" on the grounds that it is
10 vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents
11 containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to
12 this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.
13 Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-
14 client privilege, attorney work product doctrine, and any other applicable privilege.

15 **REQUEST FOR PRODUCTION E):**

16 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of
17 any CHLORINATED SOLVENTS.

18 **OBJECTIONS TO REQUEST FOR PRODUCTION E):**

19 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
20 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
21 admissible evidence. Thelen also objects to the phrase "CHLORINATED SOLVENTS" on the
22 grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it
23 seeks documents containing McKesson's trade secrets and proprietary information. In addition,
24 Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to
25 the litigation. Thelen also objects to this Request to the extent that it seeks documents protected
26 by the attorney-client privilege, attorney work product doctrine, and any other applicable
27 privilege.

28 ///

REQUEST FOR PRODUCTION F):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any HAZARDOUS SUBSTANCE.

OBJECTIONS TO REQUEST FOR PRODUCTION F):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "HAZARDOUS SUBSTANCE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION G):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any HAZARDOUS WASTE.

OBJECTIONS TO REQUEST FOR PRODUCTION G):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "HAZARDOUS WASTE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

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REQUEST FOR PRODUCTION H):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any SOLID WASTE.

OBJECTIONS TO REQUEST FOR PRODUCTION H):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "SOLID WASTE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION I):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any CHLORINATED SOLVENTS.

OBJECTIONS TO REQUEST FOR PRODUCTION I):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "CHLORINATED SOLVENTS" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

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REQUEST FOR PRODUCTION J):

ALL DOCUMENTS that REFER TO RELATE to the storage, retention, destruction, or transfer of DOCUMENTS of MCKESSON CHEMICAL between 1986 and 2005.

OBJECTIONS TO REQUEST FOR PRODUCTION J):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.

Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION K):

ALL DOCUMENTS that REFER TO RELATE to any discussion, convention, or CORRESPONDENCE with any PERSON regarding the MCKESSON SITE or the above-entitled action.

OBJECTIONS TO REQUEST FOR PRODUCTION K):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.

Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION L):

ALL DOCUMENTS that REFER TO RELATE to any discussion, conversation, or CORRESPONDENCE with UNIVAR regarding the MCKESSON SITE or the above-entitled action.

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OBJECTIONS TO REQUEST FOR PRODUCTION L):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION M):

ALL DOCUMENTS that REFER TO RELATE to any discussion, conversation, or CORRESPONDENCE with UNIVAR regarding the transmittal of ALL DOCUMENTS that relate to MCKESSON CHEMICAL.

OBJECTIONS TO REQUEST FOR PRODUCTION M):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION N):

ALL DOCUMENTS that REFER TO RELATE to any discussion, conversation, or CORRESPONDENCE with UNIVAR regarding the transmittal of ALL DOCUMENTS relate to the MCKESSON SITE.

OBJECTIONS TO REQUEST FOR PRODUCTION N):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents

1 containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to
2 this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.
3 Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-
4 client privilege, attorney work product doctrine, and any other applicable privilege.

5 Dated: May 29 2007

THELEN REID BROWN RAYSMAN & STEINER LLP

6
7 By: 

Jennifer A. Kuenster

Ross M. Petty

Attorneys for Non-Party

THELEN REID BROWN RAYSMAN &
STEINER LLP

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Attorneys for Non-Party
THELEN REID BROWN RAYSMAN & STEINER LLP

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

ANGELES CHEMICAL COMPANY, INC., a
California corporation, etc., et al.,

Plaintiffs,

v.

MCKESSON CORPORATION, a California
corporation, etc., et al.

Defendants.

AND RELATED CROSS ACTION.

Case No.: 01-10532 TJH (Ex)

Central District of California

**OBJECTIONS OF NON-PARTY
THELEN REID BROWN RAYSMAN &
STEINER LLP TO ANGELES
CHEMICAL COMPANY, INC.'S
AMENDED SUBPOENA REQUESTING
PRODUCTION OF DOCUMENTS
PURSUANT TO FRCP 45**

Place: 101 Second Street, Suite 1800, San
Francisco, California 94105

Date: June 15, 2007

Time: 9:30 a.m.

Pursuant to Federal Rule of Civil Procedure 45, non-party Thelen Reid Brown Raysman & Steiner LLP ("Thelen") submits these objections to the amended subpoena of plaintiff and cross-defendant Angeles Chemical Company, Inc. ("Angeles") dated June 1, 2007, issued by Caufield & James, LLP and electronically served on Thelen's San Francisco office on June 4, 2007 (the "Subpoena") in the above-referenced matter.

///

GENERAL OBJECTIONS

1
2 1. Thelen objects to the Subpoena to the extent it seeks documents protected by the
3 attorney-client privilege, work product doctrine, deliberative process privilege, the joint
4 prosecution or similar privilege, the privilege for negotiations leading to settlement, or other
5 applicable privileges under California law or any other applicable law.

6 2. Thelen objects to the Subpoena on the grounds that it is untimely as discovery
7 closed in this matter on June 11, 2007.

8 3. Thelen objects to the Subpoena to the extent that it imposes an undue burden on
9 Thelen by seeking documents that are neither relevant nor reasonably calculated to lead to the
10 discovery of admissible evidence, seeking an unreasonably large volume of documents, or seeking
11 documents that are equally available to the requesting party.

12 4. Thelen objects to the Subpoena on the grounds that Angeles' "DEFINITIONS" and
13 "INSTRUCTIONS," as set forth in Attachment "A" are argumentative, vague, ambiguous, and
14 unintelligible.

15 5. Thelen objects to the Subpoena on the grounds that it does not allow a reasonable
16 time period for compliance.

17 6. No incidental or implied admissions are intended by these objections. The fact that
18 Thelen objects to any request should not be taken as an admission that Thelen accepts or admits
19 the existence of any facts assumed by such request, or that such objection constitutes admissible
20 evidence as to any such assumed facts.

SPECIFIC OBJECTIONS

21
22 Without waiving or departing from its General Objections, and specifically incorporating
23 the General Objections into each of the specific objections below, Thelen makes the following
24 additional objections to specific paragraphs set forth in Attachment "A" of the Subpoena:

REQUEST FOR PRODUCTION A):

25
26 All DOCUMENTS that REFER OR RELATE to MCKESSON CHEMICAL.

OBJECTIONS TO REQUEST FOR PRODUCTION A):

27
28 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,

1 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
2 admissible evidence. Thelen further objects to this Request to the extent that it seeks documents
3 containing McKesson Corporation's ("McKesson") trade secrets and proprietary information. In
4 addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-
5 parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents
6 protected by the attorney-client privilege, attorney work product doctrine, and any other applicable
7 privilege.

8 **REQUEST FOR PRODUCTION B):**

9 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of
10 any HAZARDOUS SUBSTANCE.

11 **OBJECTIONS TO REQUEST FOR PRODUCTION B):**

12 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
13 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
14 admissible evidence. Thelen also objects to the phrase "HAZARDOUS SUBSTANCE" on the
15 grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it
16 seeks documents containing McKesson's trade secrets and proprietary information. In addition,
17 Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to
18 the litigation. Thelen also objects to this Request to the extent that it seeks documents protected
19 by the attorney-client privilege, attorney work product doctrine, and any other applicable
20 privilege.

21 **REQUEST FOR PRODUCTION C):**

22 ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of
23 any HAZARDOUS WASTE.

24 **OBJECTIONS TO REQUEST FOR PRODUCTION C):**

25 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
26 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
27 admissible evidence. Thelen also objects to the phrase "HAZARDOUS WASTE" on the grounds
28 that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks

documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION D):

ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of any SOLID WASTE.

OBJECTIONS TO REQUEST FOR PRODUCTION D):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "SOLID WASTE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION E):

ALL DOCUMENTS that REFER OR RELATE to the transfer to MCKESSON SITE of any CHLORINATED SOLVENTS.

OBJECTIONS TO REQUEST FOR PRODUCTION E):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "CHLORINATED SOLVENTS" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable

1 privilege.

2 **REQUEST FOR PRODUCTION F):**

3 ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of
4 any HAZARDOUS SUBSTANCE.

5 **OBJECTIONS TO REQUEST FOR PRODUCTION F):**

6 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
7 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
8 admissible evidence. Thelen also objects to the phrase "HAZARDOUS SUBSTANCE" on the
9 grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it
10 seeks documents containing McKesson's trade secrets and proprietary information. In addition,
11 Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to
12 the litigation. Thelen also objects to this Request to the extent that it seeks documents protected
13 by the attorney-client privilege, attorney work product doctrine, and any other applicable
14 privilege.

15 **REQUEST FOR PRODUCTION G):**

16 ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of
17 any HAZARDOUS WASTE.

18 **OBJECTIONS TO REQUEST FOR PRODUCTION G):**

19 Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome,
20 and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of
21 admissible evidence. Thelen also objects to the phrase "HAZARDOUS WASTE" on the grounds
22 that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks
23 documents containing McKesson's trade secrets and proprietary information. In addition, Thelen
24 objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the
25 litigation. Thelen also objects to this Request to the extent that it seeks documents protected by
26 the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

27 ///

28 ///

REQUEST FOR PRODUCTION H):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any SOLID WASTE.

OBJECTIONS TO REQUEST FOR PRODUCTION H):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "SOLID WASTE" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION I):

ALL DOCUMENTS that REFER OR RELATE to the transfer from MCKESSON SITE of any CHLORINATED SOLVENTS.

OBJECTIONS TO REQUEST FOR PRODUCTION I):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen also objects to the phrase "CHLORINATED SOLVENTS" on the grounds that it is vague and ambiguous. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

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///

REQUEST FOR PRODUCTION J):

ALL DOCUMENTS that REFER TO RELATE to the storage, retention, destruction, or transfer of DOCUMENTS of MCKESSON CHEMICAL between 1986 and 2005.

OBJECTIONS TO REQUEST FOR PRODUCTION J):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.

Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION K):

ALL DOCUMENTS that REFER TO RELATE to any discussion, convention, or CORRESPONDENCE with any PERSON regarding the MCKESSON SITE or the above-entitled action.

OBJECTIONS TO REQUEST FOR PRODUCTION K):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.

Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION L):

ALL DOCUMENTS that REFER TO RELATE to any discussion, conversation, or CORRESPONDENCE with UNIVAR regarding the MCKESSON SITE or the above-entitled action.

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OBJECTIONS TO REQUEST FOR PRODUCTION L):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION M):

ALL DOCUMENTS that REFER TO RELATE to any discussion, conversation, or CORRESPONDENCE with UNIVAR regarding the transmittal of ALL DOCUMENTS that relate to MCKESSON CHEMICAL.

OBJECTIONS TO REQUEST FOR PRODUCTION M):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation. Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, attorney work product doctrine, and any other applicable privilege.

REQUEST FOR PRODUCTION N):

ALL DOCUMENTS that REFER TO RELATE to any discussion, conversation, or CORRESPONDENCE with UNIVAR regarding the transmittal of ALL DOCUMENTS relate to the MCKESSON SITE.

OBJECTIONS TO REQUEST FOR PRODUCTION N):

Thelen objects to this Request on the grounds that it is overbroad and unduly burdensome, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Thelen further objects to this Request to the extent that it seeks documents

1 containing McKesson's trade secrets and proprietary information. In addition, Thelen objects to
2 this Request on the grounds that it seeks to invade the privacy of third-parties to the litigation.
3 Thelen also objects to this Request to the extent that it seeks documents protected by the attorney-
4 client privilege, attorney work product doctrine, and any other applicable privilege.

5 Dated: 6/15, 2007

THELEN REID BROWN RAYSMAN & STEINER LLP

6
7 By: 

Jennifer A. Kuenster

Ross M. Petty

Attorneys for Non-Party

THELEN REID BROWN RAYSMAN &
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CERTIFICATE OF SERVICE BY FACSIMILE

CASE NO. 01-10532 TJH (Ex)

I am over the age of 18 and not a party to the within action. I am employed in the County of San Francisco, State of California by Thelen Reid Brown Raysman & Steiner LLP. My business address is 101 Second Street, Suite 1800, San Francisco, California 94105.

On June 15, 2007, at the time and from the telephone facsimile number indicated on the attached transmission report, the following entitled document:

**OBJECTIONS OF NON-PARTY THELEN REID BROWN
RAYSMAN & STEINER LLP TO ANGELES CHEMICAL
COMPANY, INC.'S AMENDED SUBPOENA REQUESTING
PRODUCTION OF DOCUMENTS PURSUANT TO FRCP 45**

was served by transmitting true and correct copies thereof via facsimile to the following:

SEE ATTACHED SERVICE LIST

I am readily familiar with the practices of Thelen Reid Brown Raysman & Steiner LLP for sending documents via facsimile. On the above stated date, the above listed document was transmitted via facsimile and said transmission was reported complete and without error. A copy of the transmission report showing the date and time of transmission that was properly issued by the transmitting facsimile machine is attached hereto, and incorporated herein by reference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 15, 2007, at San Francisco, California.

Signature

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